

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 2 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
RALPH ZIPPER, M.D. FOR WAVE 2 CASES**

Come now the Defendants, and hereby adopt and incorporate by reference the *Daubert* motion filed against Ralph Zipper, M.D. for Ethicon Wave 1, Dkt. Nos. 2068 (motion), 2072 (memorandum in support). This Notice applies to the Wave 2 cases identified in Exhibit A attached hereto. Defendants respectfully request that the Court exclude Dr. Zipper's testimony, for the reasons expressed in the Wave 1 briefing.

Dated: July 21, 2016

Respectfully submitted,

/s/ Christy D. Jones

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 21, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

Christy D. Jones